

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

MDL NO. 16-2738 (FLW) (LGH)

THIS DOCUMENT RELATES TO ALL CASES

**PLAINTIFFS' STEERING COMMITTEES' NOTICE OF
INTENT TO CROSS NOTICE OF TAKING ORAL
DEPOSITION OF JOHN C. O'SHAUGHNESSY**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil Procedure, Plaintiffs' Steering Committee (PSC), by and through the undersigned counsel, hereby provide all parties with notice of its intent to cross-notice the videotaped deposition upon oral examination of John C. O'Shaughnessy in the above-referenced matter. A copy of the subpoena served upon Mr. O'Shaughnessy is attached as Exhibit A.

Plaintiffs reserve the right to take a supplemental (non-duplicative) deposition of John C. O'Shaughnessy as may be needed based upon the production of documents and other discovery to occur subsequent to the presently scheduled deposition.

The deposition will take place before a person authorized to administer oaths and will continue until completed at the following time:

FOR A DATE TO BE DETERMINED¹

¹ Both the witness and J&J have filed motions to quash the subpoena which was issued in accordance with a commission ordered by the Honorable Rex Burlison, Circuit Court of the City of St. Louis, Missouri. *See* Exhibit B. The motions have been stayed while the parties confer. However, at the court's order, the PSC is filing this cross notice to preserve its right to participate in any deposition that may be set as a result of this subpoena.

The deposition will be videotaped before a certified court reporter and may be used for the purposes of discovery or for use by Plaintiffs as evidence at trial, or both. You are invited to appear and take part in the examination as you deem appropriate.

Dated: April 21, 2021

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFFS' STEERING COMMITTEE

CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

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